EXHIBIT F

ANTICIPATED PERMITTING REQUIREMENTS FOR FUTURE REMEDIAL WORK

The following is an outline of anticipated permitting requirements related to implementation of future remedial actions at the subject site. For purposes of this exhibit, future remedial actions would include installation of an air sparging and soil vapor extraction (AS/SVE) remediation system near the station area next to the existing convenience store/gas station, possible installation of oxygen release compound (ORC) borings or wells in the mid-plume area, and expansion of the existing groundwater recovery and treatment system near the distal end of the plume. The need for addition of ORC in the mid-plume area will be evaluated after approximately three years operation of the systems in the station area and the distal plume area.

Permitting requirements for the three remedial action measures are discussed below and summarized in the attached table.

Permitting Requirements for the Station Area AS/SVE Remediation System
Installation of an AS/SVE remediation system near the existing convenience store/gas station would involve installation of a fenced compound or use of a 20 foot cargo box with an electrical drop, underground piping for connection of wells, and installation of SVE recovery and treatment equipment. Upon discussions with personnel at the City of Vancouver, it was discovered that due to the relatively small scope of construction, city permitting requirements for the AS/SVE system installation may be included in one single Commercial and Industrial Development Construction Permit Application. Requirements for the single permit include, among other requirements, submittal of two sets of site and construction plans, filling out a State Environmental Policy Act (SEPA) checklist, and payment of an approximate $250 permit application fee. General permit requirements are summarized in the attached table. According to city personnel, the single permit would negate the need to apply for individual fencing, electrical, or mechanical permits.

If a natural gas service is needed to operate vapor treatment equipment, then the local gas company, Northwest Natural, would need to be notified several weeks in advance of service installation. Northwest Natural would install the gas piping and meter to a point on the site close to the equipment. The gas piping from the meter to the equipment would need to be installed by a licensed plumber, and the connections would require a city mechanical inspection. Northwest Natural's fee for piping and meter installation would be based on consumption estimates.

In order to install and operate the AS/SVE system, a Notice of Construction (NOC) would need to be submitted to Southwest Air Pollution Control Authority (SWAPCA). SWAPCA would issue an Order of Approval to operate the system upon review and approval of the NOC. Required NOC submittal information is summarized in the attached table.

Permitting Requirements for Installation of ORC Borings/Wells
If determined necessary after completion of the three year review process, installation of ORC in borings along city roads would be permitted under a City of Vancouver Transportation Department right-of-way permit. Requirements for the right-of-way permit would include submittal of a traffic control plan and payment of a likely $100 permit fee.

Permitting Requirements for Modifications to Existing Recovery and Treatment System

Modifications to the existing groundwater recovery and treatment system at the distal end of the plume are not expected to result in modifications to any existing buildings or permitted structures. New wells would be drilled, underground piping would be installed on private land, and changes may be made to equipment inside the current building. It would be necessary to file a start card with Ecology for each well at a cost of $40 per well. The existing EPA NPDES permit would likely not need to be modified, because the modified groundwater recovery and treatment system is expected to comply with the current permit effluent limitations. If a different groundwater treatment technology is selected, Ecology would need to modify the permit. A letter would need to be sent to SWAPCA explaining any changes made to the system, but assuming that air discharge limitations are followed, the current SWAPCA Order of Approval 93-1547 would not need to be modified according to SWAPCA's Gerrald Strawn.

It should be noted that the much of the permitting requirement information was acquired through telephone conversations with respective agency personnel. Although AGRA made a diligent effort to determine actual permit requirements, the permits described above may or may not constitute the exact number and type of permits that will be required to complete all anticipated remedial actions. Final permitting requirements are ultimately contingent upon final system design plans and interpretations by agency personnel.